

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

MARION GOODING,

Plaintiff,

v.

JOHN KETCHER *et al.*,

Defendants.

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Case No. 11-cv-131-TCK-FHM

**UNOPPOSED MOTION TO STAY
PROCEEDINGS TO PURSUE SETTLEMENT**

Comes Now, the Defendant, John Ketcher, by and through the undersigned attorneys, hereby respectfully submit this motion to stay the proceedings to pursue settlement.

The parties are currently engaged in settlement discussions, but need additional time to continue discussions and attempt to reach terms of agreement. The Defendant has spoken with counsel for the Plaintiff and there is no objection to the proposed stay.

In order to allow the parties to continue their settlement efforts, the Defendant respectfully moves this Court pursuant to Fed. R. Civ. P. 1, to stay the proceedings for sixty (60) days. A stay of these proceedings will accommodate possible amicable resolution of this matter and serve the interest of preserving judicial resources and the parties' resources. The Defendant proposes that the deadline to file the Joint Status Report be extended to the 11th day of June, 2012, in the event that there has not been a joint stipulation of dismissal filed by that date.

Wherefore, the Defendant respectfully requests that this Court grant this motion and stay this case, and extend the deadline to file a Joint Status Report to the 11th day of June, 2012, in the event that there has not been a stipulation of dismissal of this matter by that date.

Respectfully Submitted,

/s/ Todd Hembree

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of April, 2012, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the Following ECF registrants:

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/s/ Todd Hembree